REMARKS

Please reconsider this application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1, 4-8, and 10-21 are pending in this application. Claims 1, 10, 11, 15, and 18 are independent. The remaining claims depend, directly or indirectly, from claims 1, 11, 15, and 18.

Claim Amendments

Independent claims 1, 10, 11, 15, and 18 have been amended by way of this reply. Specifically, claims 1, 10, 11, 15, and 18 have been amended to clarify that a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field. No new matter has been added by way of these amendments, as support for these amendments may be found, for example, in paragraph [0094] of the publication of the Specification. Further, claim 11 has been amended merely to provide consistency with the other independent claims. No new matter has been added by way of this amendment.

Rejection(s) under 35 U.S.C § 103

Claims 1, 8, 11, 12, and 15-17

Claims 1, 8, 11, 12, and 15-17 are rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 5,920,867 issued to Van Huben *et al.* (hereinafter "Van Huben") in view of U.S. Patent No. 5,201,047 issued to Maki *et al.* (hereinafter "Maki"), and further in view of the document titled, "A Distributed Scientific Data Archive Using the Web, XML, and

SQL/MED" by Papiani *et al.* (hereinafter "Papiani"). Independent claims 1, 11, and 15 have been amended in this reply to clarify the invention recited. To the extent that this rejection may still apply to the amended claims, the rejection is respectfully traversed.

"To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." (*See* MPEP §2143). The Applicant respectfully asserts that the cited references do not teach all the claimed limitations.

The claimed invention is directed to a method of creating and defining custom data fields in a process management system. As discussed with reference to one embodiment of the invention, a Process Manager (PM) (78) is an application that runs on top of an application server to develop, deploy, and manage business processes (*see, e.g.,* Publication of the Specification, paragraph [0015]). A Process Manager Builder (PMB) (91) is a visual process design tool that can be used to create and deploy PM (78) applications (*see, e.g.,* Publication of the Specification, paragraph [0017]). While a PMB (91) allows a user to build applications and control the flow of processes, it may occasionally be necessary to create a data field different from the built-in data sources. In such a case, a custom data field may be defined, created, and implemented when building an application (*see e.g.,* Publication of the Specification, paragraph [0060]).

Figure 15 shows an archive file for a custom data field in accordance with one embodiment of the invention. In one embodiment of the invention, packaging a custom data field begins by creating an archive file in a utility application such as, for example, WinZip or

PKZip (*see, e.g.,* Publication of the Specification, paragraph [0094]). As shown in Figure 15, each of the files added to the archive is compressed from a first size to a packed size by a ratio that varies depending on various factors that are well understood by one skilled in the art. Further, the directory structure of the archive reflects the package structure of the class used by the custom data field. For example, as shown in Figure 15, if the class files are in the package "customer.fields," then the class files in the archive file are in the directory "customer/fields" (200) (*see, e.g.,* Publication of the Specification, paragraph [0095]).

Accordingly, amended independent claim 1 requires packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field. Amended independent claims 11 and 15 include limitations similar to limitations of claim 1.

Van Huben, in contrast to the claimed invention, fails to teach or suggest all the limitations of the claimed invention. The Examiner asserts that Van Huben teaches packaging a file and a model into an archive file. However, Van Huben does not teach packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field.

The Examiner notes that Van Huben is directed to archiving and backing up data in a library. Van Huben simply describes a simple archival process to a tape drive or another repository. For example, when a design control repository becomes corrupted or an individual data object is deleted, a back-up copy allows the repository or the object to be restored (*see* Van Huben, col. 28, lines 41-62). Van Huben is clearly not directed to packaging a file specifying visible field properties and a model of a custom data field into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an

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object-oriented class of the custom data field, as required by amended independent claims 1, 11, and 15.

As discussed above, Van Huben fails to teach or suggest all the limitations of independent claims 1, 11, and 15. Similarly, Maki fails to teach or suggest all the limitations of claims 1, 11, and 15, and fails to provide that which Van Huben lacks. Like Van Huben, Maki does not teach or suggest packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field.

Maki is directed to automated classification for group technology applications. Group technology is based on exploiting similarities in parts or items for classification purposes (*see* Maki, col. 1, lines 6-22). Specifically, Maki describes a codeless classification system for locating items with similar attributes, avoiding necessary reclassification when a code hierarchy changes (*see* Maki, *e.g.*, col. 2, lines 66-68). In contrast to the claimed invention, Maki teaches creating files comprising an item classification and retrieval system, which are stored in a database (*see* Maki, col. 3, lines 8-17). The attributes relationship file (40) of Maki is not directed to a custom data field, but rather to parameter values of objects that are stored in a relational database (*see* Maki, col. 4, lines 61-65). Maki completely fails to contemplate packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field.

As discussed above, Van Huben and Maki fail to teach or suggest all the limitations of independent claims 1, 11, and 15. Similarly, Papiani fails to teach or suggest all the limitations of claims 1, 11, and 15, and fails to provide that which Van Huben and Maki lack. Like Van Huben and Maki, Papiani does not teach or suggest packaging a file and a model

into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field.

Papiani is directed to a web-based architecture for storing, searching, and retrieving distributed data (*see* Papiani, abstract). In contrast to the claimed invention, Papiani describes a user of the system of Papiani connecting to a web server on a database server host, which invokes a Java™ servlet program to handle requests from a client (*see* Papiani, Section 2.1, paragraph 2). The database server of Papiani stores metadata that describes scientific information such as simulation titles, descriptions, and authors, related to files in a remote file server. Thus, information about a file is stored locally, while the file itself is stored in a remote file server (Papiani, Section 2.1, paragraphs 3-4). Papiani additionally teaches the use of a hypertext link to download a given file from a file server (Papiani, Section 2.1, paragraph 4).

However, the mere fact that Papiani teaches a distributed data archive using the Internet and object-oriented programming does not suggest creating or defining custom data fields as required by the claimed invention. In fact, it would be clear to one skilled in the art that Papiani is not related to custom data fields, and that Papiani does not teach or suggest packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field, as required by amended independent claims 1, 11, and 15.

The Examiner appears to have read the recited claims of the invention overly broad in an attempt to render the claims obvious. Further, the Examiner's attempt to equate a web-based architecture for storing, searching, and retrieving distributed data, as disclosed by Papiani, to a custom data field within a process management system, as recited in the claims, requires the Examiner to improperly read out express limitations of the claims. Applicant's recited claims expressly require that a directory structure of the archive file reflect a structure of

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an object-oriented class of a custom data field, which is clearly not taught or suggested by Papiani. Accordingly, this express limitation should not be improperly read out of the claim by the Examiner.

Further, in rejecting the claims of the invention, the Examiner has improperly combined non-analogous art in an attempt to render the claimed invention obvious. As discussed above, Papiani is directed to a web-based architecture for storing, searching, and retrieving distributed data. To the extent that Papiani discusses object-oriented programming, Papiani merely teaches that an XML document can be customized to change the appearance of *a user interface*. Papiani clearly does not teach or suggest packaging a file and a model into an archive file, where the archive file is compressed and where a directory structure of the archive file reflects a structure of an object-oriented class of the custom data field. It would be clear to one skilled in the art that Papiani is not analogous to the claimed invention, and not combinable with Van Huben and Maki.

Further, the Examiner has improperly combined Van Huben with Maki, as Van Huben teaches away from Maki. Within the Van Huben reference, the deficiencies of Maki are spelled out in such a fashion that one skilled in the art would not combine Van Huben with Maki. Specifically, Van Huben states that Maki "requires that the data items being grouped share at least one common attribute to enable the grouping, and therefore fails to address problems of managing data aggregates formed from disparate and unrelated data objects" (*see* Van Huben, col. 5, lines 5-17). Such disparaging comments by Van Huben clearly suggest that the references are not meant to be combined. Accordingly, the Examiner improperly combined Maki with Van Huben in an attempt to render the claimed invention obvious.

In view of the above, Van Huben, Maki, and Papiani, whether taken separately or in combination, (i) fail to teach or suggest the invention as recited in amended independent

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claims 1, 11, and 15, and (ii) are not properly combinable. Thus, amended independent claims 1, 11, and 15 are patentable over Van Huben, Maki, and Papiani. Claims 8, 12, 16, and 17, directly or indirectly dependent from claims 1, 11, and 15, are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 4-7, 10, 13, 14, and 18-21

Claims 4-7, 10, 13, 14, and 18-21 are rejected under 35 U.S.C. § 103(a) as being obvious over Van Huben (as cited above) in view of Maki (as cited above), Applicant Admitted Prior Art (hereinafter "AAPA"), and further in view of Papiani. Independent claims 1, 10, 11, and 18 have been amended in this reply to clarify the invention recited. To the extent that this rejection may still apply to the amended claims, the rejection is respectfully traversed.

As discussed above, Van Huben, Maki, and Papiani, whether taken separately or in combination, fail to teach or suggest all the limitations of independent claims 1, 10, and 11. Amended independent claim 18 includes limitations similar to claim 1, and is allowable over Van Huben, Maki, and Papiani for at least the above reasons.

AAPA fails to teach or suggest that which Van Huben, Maki, and Papiani lack. AAPA does not teach or suggest the invention as recited by amended independent claims 1, 10, 11, and 18. AAPA merely discloses a universal platform (Java™) for providing resources to various platforms across the Internet and related applications (*see* Publication of the Specification, paragraphs [0002]-[0003]). For example, AAPA discusses a process manager (78), which allows a user to create web-based applications, and a process manager builder, which allows a user to create and deploy process manager applications (*see* Publication of the Specification, paragraphs [0016]-[0017]). However, AAPA does not teach or suggest packaging a file and a model into an archive file, where the archive file is compressed and where a

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directory structure of the archive file reflects a structure of an object-oriented class of the custom data field.

Further, the Examiner acknowledges that Van Huben in view of Maki fails to teach or suggest a model of a custom data field as required by claims 6 and 13 of the invention. However, the Examiner asserts that AAPA teaches that a model comprises a written class and at least two implemented interfaces. Applicant respectfully disagrees because AAPA does not teach or suggest a model of a custom data field, as recited in claims 6 and 13. Specifically, the Examiner asserts that the process map shows the model in Figures 5 and 8. However, Figures 5 and 8 of the application show screen shots of a visual process map (120) in a Process Manager Builder (91), and a Process Manager Administrator (94), respectively. A visual process map (120) allows a user to graphically modify a process (see, e.g., Specification, paragraph [0018]). A Process Manager Administrator (94) is merely an administrative interface designed to: (a) manage Process Manager (PM) clusters (96) and (b) monitor and manage deployed processes or applications (see, e.g., Specification, e.g., paragraph [0023]). Thus, AAPA clearly fails to teach or suggest that a **model** comprises a written class and at least two implemented interfaces. In fact, Figures 5 and 8 fail to teach or suggest *anything* associated with a **model**.

In view of the above, Van Huben, Maki, Papiani, and AAPA, whether taken separately or in combination, fail to teach or suggest the invention as recited in amended independent claims 1, 10, 11, and 18. Thus, amended independent claims 1, 10, 11, and 18 are patentable over Van Huben, Maki, Papiani, and AAPA. Claims 4-7, 13, 14, and 19-21, which depend directly or indirectly from claims 1, 10, 11, and 18, are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places

this application in condition for allowance. If this belief is incorrect, or other issues arise, the

Examiner is encouraged to contact the undersigned or his associates at the telephone number

listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591

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